

EXHIBIT A



HONORABLE BRENDA L. MILLER
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Document Name: DOCKET SHEET

Case Number: 20-C-70

Bill: THOMAS COMBS & SPANN

300 SUMMERS STREET

CHARLESTON WV 25301

Date and Sender's initials:

NL 4/29/20

SCOTT E HILL

VS. VERIZON WIRELESS LLC

LINE DATE ACTION

1 03/23/20 COMPLAINT; MEMO; SUMMONS ID TO VERIZON WIRELESS LLC C/O CT
2 CORPORATION SYSTEM; RECEIPT
3 04/06/20 SOS ACCEPTANCE OF SERVICE ID TO VERIZON WIRELESS (VAW) LLC ON
4 SERVICE DATE 03/27/2020;



**Service of Process
Transmittal**

04/03/2020

CT Log Number 537488304

TO: Angela Aizawa
Verizon Communications Inc.
1 Verizon Way
Basking Ridge, NJ 07920-1097

RE: Process Served in West Virginia

FOR: Verizon Wireless (VAW) LLC (Domestic State: DE)

ENCLOSED ARE COPIES OF LEGAL PROCESS RECEIVED BY THE STATUTORY AGENT OF THE ABOVE COMPANY AS FOLLOWS:

TITLE OF ACTION: SCOTT E. HILL, PLTF. vs. VERIZON WIRELESS, LLC, DFT.
Name discrepancy noted.

DOCUMENT(S) SERVED: .

COURT/AGENCY: None Specified
Case # 20C70

NATURE OF ACTION: .

ON WHOM PROCESS WAS SERVED: C T Corporation System, Charleston, WV

DATE AND HOUR OF SERVICE: By Certified Mail on 04/03/2020 postmarked on 03/30/2020

JURISDICTION SERVED : West Virginia

APPEARANCE OR ANSWER DUE: .

ATTORNEY(S) / SENDER(S): None Specified

REMARKS: Please note transmittal has been edited to correct nature of action

ACTION ITEMS: CT has retained the current log, Retain Date: 04/03/2020, Expected Purge Date: 04/08/2020

Image SOP

Email Notification, Angela Aizawa angela.aizawa@verizon.com

Email Notification, David Krebs David.Krebs@VerizonWireless.com

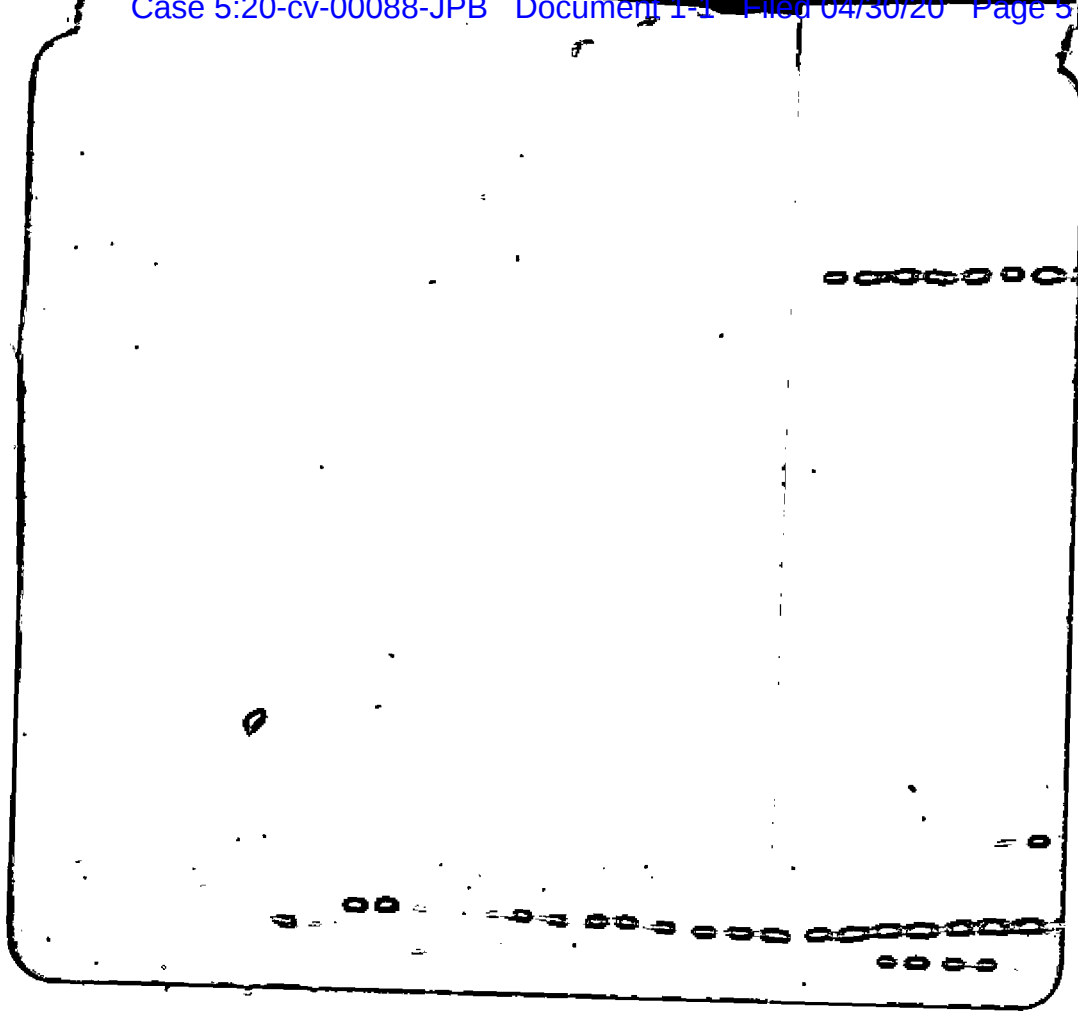
Email Notification, JACK MINNEAR jack.minnear@verizon.com

Email Notification, David Haga david.haga@verizon.com

SIGNED: C T Corporation System
ADDRESS: 1999 Bryan St Ste 900
Dallas, TX 75201-3140

For Questions: 877-564-7529
MajorAccountTeam2@woltersklower.com

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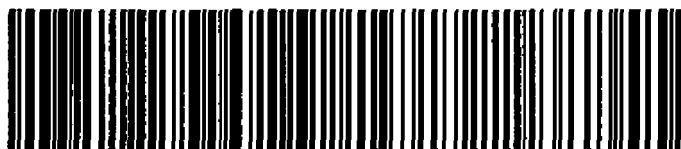


Office of the Secretary of State
Building 1 Suite 157-K
1900 Kanawha Blvd E.
Charleston, WV 25305



Mac Warner
Secretary of State
State of West Virginia
Phone: 304-558-6000
886-767-8683
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VERIZON WIRELESS (VAW) LLC
CT CORPORATION SYSTEM
1627 QUARRIER ST
CHARLESTON, WV 25311-2124

Control Number: 256411

Defendant: VERIZON WIRELESS (VAW) LLC
1627 QUARRIER ST
CHARLESTON, WV 25311-2124 US

Agent: CT CORPORATION SYSTEM

County: Ohio

Civil Action: 20-C-70

Certified Number: 92148901125134100002696341

Service Date: 3/27/2020

I am enclosing:

1 summons and complaint

which was served on the Secretary at the State Capitol as your statutory attorney-in-fact. According to law, I have accepted service of process in the name and on behalf of your corporation.

Please note that this office has no connection whatsoever with the enclosed documents other than to accept service of process in the name and on behalf of your corporation as your attorney-in-fact. Please address any questions about this document directly to the court or the plaintiff's attorney, shown in the enclosed paper, not to the Secretary of State's office.

Sincerely,

A handwritten signature in cursive script that reads "Mac Warner".

Mac Warner
Secretary of State

SUMMONS

CIRCUIT COURT OF OHIO COUNTY, WEST VIRGINIA

SCOTT E. HILL
PLAINTIFF,
VS.

CIVIL ACTION NO. 20-C-70
JUDGE: DAVID J. SIMS

VERIZON WIRELESS LLC.
c/o CT CORPORATION SYSTEM
DEFENDANT

To the above named Defendant:

IN THE NAME OF THE STATE OF WEST VIRGINIA, you are hereby Summone
and required to serve upon JASON CAUSEY, plaintiff's attorney, whose address is,
BORDAS & BORDAS, PLLC, 1358 NATIONAL ROAD, WHEELING, WV 26003 an
answer including any related counterclaim you may have to the complaint filed against you
in the above civil action, a true copy of which is herewith delivered to you. You are required
to serve your answer within 30 days after service of this summons upon you, exclusive of
the day of service. If you fail to do so, judgment by default will be taken against you for the
relief demanded in the complaint and you will be thereafter barred from asserting in another
action any claim you may have which must be asserted by counterclaim in the above style
civil action.

Dated: March 23, 2020

BRENDA L MILLER
CLERK OF COURT

BY:

Becky Henry
DEPUTY CLERK

Please Serve:
VERIZON WIRELESS LLC.
c/o CT CORPORATION SYSTEM
1627 QUARRIER STREET
CHARLESTON, WV 25311

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MAR 27 2020

IN THE CIRCUIT COURT OF OHIO COUNTY, WEST VIRGINIA

SCOTT E. HILL,

Plaintiff,

vs.

Case No. 20-C- 70

VERIZON WIRELESS, LLC,

Judge Sims

Defendant.

COMPLAINT

COMES NOW the Plaintiff, Scott Hill, who for his Complaint against the Defendant, Verizon Wireless, LLC, alleges as follows:

PRELIMINARY STATEMENT

1. This action for damages is based on the Fair Credit Reporting Act regarding an alleged consumer debt that has been falsely reported to the credit reporting agencies as no such debt belongs to the Plaintiff.

PARTIES

2. Plaintiff Scott Hill is a natural person and resident of West Virginia.
3. Verizon Wireless, LLC ("Verizon") is a limited liability company organized under the laws of Delaware and service can be affected on its agent for service of process, CT Corporation System, 1627 Quarrier Street, Charleston, West Virginia 25311-2124.

FACTS

4. Plaintiff, Scott E. Hill, is a "consumer" as that term is defined by 15 U.S.C. § 1681a(c).
5. Plaintiff does not have a contract with and did not obtain service from Verizon Wireless, Inc. In 2018, Plaintiff obtained a quote for service from Verizon Wireless but no



1358 National Road
Wheeling, WV 26003
t 304-242-8410
f 304-242-3936

106 East Main Street
St. Clairsville, OH 43950
t 740-695-8141
f 740-695-6999

526 7th Street
Moundsville, WV 26041
t 304-845-5600
f 304-845-5604

One Gateway Center
420 Ft. Duquesne Blvd.
Suite 1800
Pittsburgh, PA 15222
t 412-502-5000
f 412-709-6343

contract nor service was established. Instead, Plaintiff obtained service from another wireless carrier.

6. For reasons unknown to the Plaintiff, Defendant Verizon Wireless, reported the Plaintiff as delinquent on an account (no. 04890595550xxxx) that he did not establish and, eventually, turned the account over to debt collectors for collection.

7. As a result, Scott Hill has suffered adverse credit decisions, including being declined for a mortgage loan.

8. On or about March 22, 2019, Plaintiff obtained a three-credit agency, Merged Infile Credit Report from Gateway Mortgage Group, LLC when it declined him for a mortgage loan and informed him of the adverse Verizon Wireless account.

9. Plaintiff contacted Verizon Wireless by telephone through multiple calls, but despite informing Verizon Wireless of the inaccurate reporting – it did not remove the false reporting or withdraw the account.

10. By reports dated March 22, 2019, June 14, 2019 and September 17, 2019, Mr. Hill obtained a copy of his credit profile from Experian. The reports included an adverse Verizon Wireless account that was furnished by Defendant Verizon. This account has a partial account number 4890595550 (the “subject account”), which again does not in fact belong to the Plaintiff, Scott Hill. The subject account was reported as a “collection account” and “past due.” For example, the June 14, 2019 report states “[c]ollection account. \$178 past due as of May 2019. This account is scheduled to continue on record until November 2024.”

11. By reports dated March 22, 2019 and September 17, 2019, Mr. Hill obtained a copy of his credit profile from Equifax. The reports included an adverse Verizon account that was



BORDAS
AND
BORDAS
ATTORNEYS, PLLC

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furnished by Defendant Verizon. The subject account was reported as a "collection account" and "past due."

12. By report dated March 22, 2019, Mr. Hill obtained a copy of his credit profile from Transunion. The report includes an adverse Verizon account that was furnished by Defendant Verizon. The subject account is coded as a collection account and past due.

13. By written correspondence dated September 11, 2019, Plaintiff Scott Hill filed a written dispute with Experian.

14. By written correspondence dated September 22, 2019, Plaintiff Scott Hill filed written disputes with Equifax and Transunion.

15. Defendant received notification of Plaintiff's dispute from Experian and verified its reporting as accurate, as reflected in Experian's Dispute Results dated October 4, 2019.

16. Defendant received notification of Plaintiff's dispute from Transunion and verified its reporting as accurate, as reflected in Transunion's Investigation Results dated October 31, 2019.

17. Upon information and belief, Defendant received notification of Plaintiff's dispute from Equifax and verified its reporting as accurate.

18. Verizon Wireless failed to conduct lawful investigations upon receiving the above described dispute notices and, upon information and belief, unlawfully and wrongfully verified the debt as accurate on multiple occasions.

19. By letters dated November 11, 2019 and February 12, 2020 from third-party debt collector ERC, Defendant attempted to collect the debt or account balance that was not fairly due and owing from Plaintiff.



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20. Defendant's false credit reporting resulted in the Plaintiff suffering adverse actions and consequences, including, the denial of credit.

21. As a direct and proximate result of the Defendant's acts and omissions, the Plaintiff has suffered and continues to suffer actual damages, including, without limitation, credit denials, adverse credit decisions, missed credit opportunities, damage to his reputation, annoyance, aggravation, inconvenience, humiliation, embarrassment and emotional distress.

COUNT I

Violations of the Fair Credit Reporting Act 15 U.S.C. § 1681s-2(b)

22. Plaintiff incorporates by reference all preceding paragraphs as though fully stated herein.

23. Defendant Verizon Wireless willfully and/or negligently violated 15 U.S.C. § 1681s-2(b) by failing to conduct reasonable investigations upon receiving notice of Plaintiff's disputes, and/or by failing to appropriately report the results of its investigations, and/or by failing to appropriately modify, delete, and/or block the information.

24. As a result of Verizon Wireless' violations of § 1681s-2(b), Plaintiff has suffered actual damages as further described herein. Plaintiff is therefore entitled to recover actual and/or statutory damages pursuant to 15 U.S.C. §§ 1681n and/or 1681o.

25. Verizon Wireless' actions and omissions were willful, rendering it liable for punitive damages pursuant to 15 U.S.C. § 1681n.

26. Plaintiff is entitled to recover costs and attorney's fees from Defendant Verizon Wireless pursuant to 15 U.S.C. §§ 1681n and/or 1681o.



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WHEREFORE, the Plaintiff respectfully requests that the Court enter judgment against the Defendant for all damages and penalties alleged herein, together with pre and post judgment interest, attorney fees, and any other legal or equitable relief the court deems just and proper.

A TRIAL BY JURY IS DEMANDED ON ALL ISSUES

Respectfully Submitted,

SCOTT E. HILL

By:

JASON E. CAUSEY #9482
BORDAS & BORDAS, PLLC
1358 National Road
Wheeling, WV 26003
(304) 242-8410
Counsel for Plaintiff



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Wheeling, WV 26003
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f 304-242-3936

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